

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

POWER BUYING DEALERS USA, INC., a
Delaware corporation,

Plaintiff,

v.

JUUL LABS, INC., a Delaware corporation,
and HS WHOLESALE, LIMITED, an Illinois
corporation,

Defendants.

Case No. 1:21-cv-3154

Judge Sharon J. Coleman

Magistrate Judge Jeffrey T. Gilbert

**DECLARATION OF SAMER ODEH IN SUPPORT OF
PLAINTIFFS' ALTERNATIVE MOTION TO AMEND THE COMPLAINT**

I, Samer Odeh, submit the following declaration pursuant to 28 U.S.C. § 1746 in support
of Plaintiffs' Alternative Motion to Amend the Complaint.

1. I am the President of Power Buying Dealers USA, Inc. ("PBD"). I have held this
position since the formation of the company.

2. During the period 2018 and 2019, PBD sold Juul devices and other Juul products
to B&G Wholesale in Houston in excess of \$236,000.

3. During the period 2018 and 2019, PBD sold Juul devices and other Juul products
to Zee Wholesale in Michigan in excess of \$120,000.

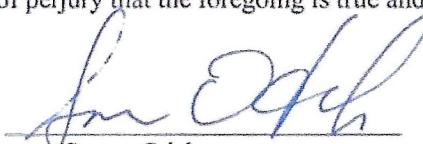
4. During the year 2018, PBD sold Juul devices and other Juul products to customers
in states other than Illinois in the amounts set forth below:

California	\$50,000
Arizona	\$75,000
Nevada	\$23,380

Texas	\$236,820
New York	\$1,112,637
Pennsylvania	\$1,504,000
Michigan	\$193,308
Wisconsin	\$33,000
Indiana	\$5,050
Florida	\$1,018,000
Georgia	\$1,131,680
South Carolina	\$25,000

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 2, 2022


Samer Odeh